



Erik M. Bashian, Esq.  
T: (516) 279-1554  
F: (516) 213-0339  
[eb@bashpaplaw.com](mailto:eb@bashpaplaw.com)

\*Admitted to Practice in New York and New Jersey

VIA CM/ECF

November 18, 2020

U.S. Magistrate Judge Debra C. Freeman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Mercer v. Hotel Wayne, Inc., Case No.: 1:20-cv-8885-JPO-DCF**

Dear Magistrate Judge Freeman:

This office represents the Plaintiff Stacey Mercer ("Plaintiff") in connection with the above-referenced action. Plaintiff has been contacted by out-of-state counsel for the defendant Hotel Wayne, Inc. ("Defendant") (copied herein) who is not licensed to practice in the Southern District of New York (SDNY). As a result, Mr. Henry has requested on behalf of the Defendant, an extension of time to answer or otherwise respond to Plaintiff's complaint for thirty (30) days while it seeks to retain counsel licensed to practice law in the SDNY. Plaintiff consents to this request, as Defendant has agreed to waive all defenses to service of the complaint. Accordingly, it is respectfully requested that Defendant's time to answer or otherwise respond to Plaintiff's complaint be extended for thirty (30) days.

We thank the Court for your time and consideration in this matter.

The requested extension is granted.  
SO ORDERED

  
DEBRA FREEMAN  
United States Magistrate Judge  
Dated: 11/18/2020

Respectfully submitted,

BASHIAN & PAPANTONIOU, P.C.

/s/ Erik M. Bashian

Erik M. Bashian, Esq.

cc: Richard B. Henry, Esq. (via email only)